

GOPINATHAN, on behalf of Defendant, INEEDMD.

37. As a result of the fraud on the part of Defendants, INEEDMD, and GOPINATHAN, Plaintiffs have incurred damages in an amount to be determined at trial.

**AS AND FOR A FOURTH CAUSE OF ACTION
AGAINST DEFENDANTS, INEEDMD
AND GOPINATHAN, FOR UNJUST ENRICHMENT:**

38. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in paragraphs "1" through "37" of this Complaint with the same force and effect as though the said paragraphs were more fully and completely set forth herein at length.

39. Plaintiff, GREEN, used his own personal funds and also used funds and other resources provided by Plaintiffs, GREEN GLOBAL and NADC, in developing and operating Defendant, INEEDMD.

40. The amounts expended by Plaintiffs, GREEN, GREEN GLOBAL, and NADC, for the development and operation of Defendant, INEEDMD, have not been repaid.

41. Defendants, INEEDMD and GOPINATHAN, were unjustly enriched in an amount to be determined at trial, but which amount is not less than \$1,500,000.00 with interest thereon.

**AS AND FOR A FIFTH CAUSE OF ACTION
AGAINST DEFENDANTS, INEEDMD
AND GOPINATHAN, FOR PRIMA FACIE TORT:**

42. Plaintiffs repeat, reiterate, and reallege each and every allegation contained in paragraphs "1" through "41" of this Complaint with the same force and effect as though the said paragraphs were more fully and completely set forth herein at length.

43. Defendants, INEEDMD and GOPINATHAN, intentionally inflicted harm on Plaintiff, GREEN, by terminating the said Plaintiff's employment without just

cause.

44. That the infliction of harm caused by Defendants, INEEDMD and GOPINATHAN, was without any excuse or justification.

45. That as a result of the intentional infliction of harm caused by Defendants, INEEDMD and GOPINATHAN, the Plaintiffs have been damaged in an amount to be determined at trial.

WHEREFORE, Plaintiffs, demand judgment as follows:

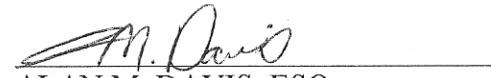
- 1) On the First Cause of Action for breach of contract, Plaintiffs demand a judgment in an amount to be determined at trial, but which amount is not less than \$1,500,000.00 with interest thereon;
- 2) On the Second Cause of Action for promissory estoppel, Plaintiffs demand a judgment in an amount to be determined at trial, but which amount is not less than \$1,500,000.00 with interest thereon;
- 3) On the Third Cause of Action for fraud, Plaintiffs demand a judgment in an amount to be determined at trial, but which amount is not less than \$1,500,000.00 with interest thereon;
- 4) On the Fourth Cause of Action for unjust enrichment, Plaintiffs demand a judgment in an amount to be determined at trial;
- 5) On the Fifth Cause of Action for prima facie tort, Plaintiffs demand a judgment in an amount to be determined at trial;
- 6) Plaintiffs demand a judgment for such other and further relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiffs demand a trial by jury.

Dated: Amityville, New York
March 27, 2014

Respectfully Submitted,


ALAN M. DAVIS, ESQ.
Attorney for Plaintiffs
121-B West Oak Street
Amityville, New York 11701
(631) 598-0500

Index No.: 14 CV 2184 ^{AMF} _{RLE} Year 2014

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FERNANDO GREEN a/k/a FREDDY GREEN, GREEN GLOBAL FUNDING INC., and NATIONAL ASSET DEBT CONSOLIDATION, INC.

Plaintiffs,

-against-

INEEDMD, INC. and GOVINDAN GOPINATHAN, M.D.,

Defendants.

COMPLAINT

ALAN M. DAVIS
ATTORNEY AT LAW
Attorney for Plaintiffs
121-B West Oak Street
Amityville, New York 11701
(631) 598-0500 - FAX (631)598-05

To:

Attorney(s) for

I certify that, to the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstance, the presentation of this paper or the contentions herein are not frivolous as defined in subsection (c) of section 130-1.1 of the Rules of the Chief Administrator.

Dated: March 27, 2014

~~m. Davis~~

Alan M. Davis, Esq.

Service of a copy of the within is hereby admitted.

Attorney(s) for

PLEASE TAKE NOTICE.

[] that the within is a (certified) true copy of a duly entered in the office of the clerk of the
within named Court on , 20

[] that an Order of which the within is a true copy will be presented for settlement to the
Hon. one of the judges of the within named Court, at , on
, 20 at M.

Dated: March 27, 2014

ALAN M. DAVIS
ATTORNEY AT LAW
Attorney for Plaintiffs
121-B West Oak Street
Amityville, New York 11701
(631) 598-0500 - FAX (631) 598-0506

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Attorney(s) for